

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

HORLEY RENGIFO-PAREJA

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3:10-CR-073-K

ECF

MOTION FOR DETENTION

The United States moves for pretrial detention of defendant, **Horley Rengifo-Pareja**, pursuant to 18 U.S.C. §3148.

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. § 3156);
- ☐ Maximum sentence life imprisonment or death
- ☒ 10 + year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice
- ☐ Felony involving a minor victim
- ☐ Felony involving a firearm, destructive device, or any other dangerous weapon
- ☐ Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

 X Defendant's appearance as required

 X Safety of any other person and the community

3. Rebuttable Presumption. The United States will/will not invoke the rebuttable presumption against defendant because (check one or both):

 X Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

 Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)

 Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251

 Previous conviction for "eligible" offense committed while on pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

 At first appearance

 X After continuance of 3 days (not more than 3).

DATED this 8th day of June, 2015.

Respectfully submitted,

JOHN R. PARKER
ACTING UNITED STATES ATTORNEY

s/ *Walt M. Junker*

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of this notice were served on counsel of record by electronically filing the pleading with the clerk of court for the U.S. District Court, Northern District of Texas using the ECF system on the 8th day of June, 2015.

s/ *Walt M. Junker*

WALT M. JUNKER
Assistant United States Attorney